

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SIMEON NILES,

Plaintiff

v.

TOWN OF WAKEFIELD, STEVEN SKORY,
in his individual capacity, KENNETH SILVA, in
his individual capacity, JOHN WHALEY, in his
individual capacity and SCOTT REBOULET, in
his individual capacity,

Defendants.

C.A. No. 1:13-cv-13086-JGD

AFFIDAVIT OF CHANTELE M. D'ANGELO, ESQ.

I, Chantelle M. D'Angelo, do hereby swear and depose the following:

1. I am counsel for the Defendants, Town of Wakefield, Steven Skory, Kenneth Silva, John Whaley, and Scott Reboulet.
2. Attached as Exhibits to the Defendants' Motion to Compel Plaintiff's Production of Medical Records from the Lahey Clinic are copies of correspondences in the form of emails and letters, an excerpt of the plaintiff's deposition transcript, and plaintiff's responses to defendants' first set of requests for production of documents.
3. As of the filing of this motion, the defendants are not in possession of the plaintiff's medical records from the Lahey Clinic.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 15th DAY OF
JULY 2015.

/s/Chantelle M. D'Angelo

Chantelle D'Angelo (BBO #688165)